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April 14, 2023

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court

Re: *Ashley Francis v. Ludlow Street Development, LLC and New York Cremeria, Inc.*

Docket No. 1:22-cv-06578 (LGS)(RWL)

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. Pursuant to paragraph 12(b) of the Civil Case Management Plan and Scheduling Order, “in the event that [the parties] have not already been referred for settlement discussions, shall also advise the Court whether or not the request a referral for settlement discussions as provided in Paragraph 4(c) above.”

The parties have not been referred for settlement discussions. The parties respectfully request a referral for settlement discussions as provided in Paragraph 4(c) of the Civil Case Management Plan and Scheduling Order.

Pursuant to paragraph 12(b) of the Civil Case Management Plan and Scheduling Order, the parties hereby provide a joint status letter as outlined in Your Honor’s Individual Rule IV. A. 2.

(a) What discovery has taken place, specifically

(1) What discovery requests have been propounded, who propounded each request and on what date,

On December 29, 2022, plaintiff propounded a Request for Documents as well as a First Set of Interrogatories upon both defendants;

On January 3, 2023, plaintiff served a First Request for Admissions upon defendant New York Cremeria, Inc.

On January 9, 2023, defendant New York Cremeria, Inc. propounded a Request for Documents as well as a First Set of Interrogatories;

(2) What responses were made, who made each response and on what date,

On February 17, 2023, Defendants responded to plaintiff’s Interrogatories and Request for Documents.

On February 8, 2023, Plaintiff responded to defendant New York Cremeria, Inc.'s discovery requests;

(3) The volume of documents produced, who produce the documents and when;

On February 17, 2023, Defendant New York Cremeria, Inc. produced 138 pages of documents. On February 17, 2023, Defendant Ludlow Street Development, LLC produced 140 pages of documents.

(b) The procedural history of the case today, specifically

(1) What pleadings have been filed, who filed each pleading and on what date,

Plaintiff filed the Complaint on August 2, 2022.

Defendants Ludlow Street Development, LLC filed an Answer to the complaint on September 30, 2022.

Defendant New York Cremeria, Inc. filed an Answer to the complaint on December 26, 2022.

(2) What motions, if any, have been filed, who filed the motion and on what date each motion was filed,

No motions have been filed to date; and

(3) What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed; and

No motions are currently pending.

(c) The parties' plans to ensure that they meet the Court ordered discovery deadlines.

The parties plan on meeting the Court ordered discovery deadlines as fact discovery has closed and the time for the parties to meet and confer on a schedule for expert disclosures has expired pursuant to Paragraph 9(c) of the Civil Case Management Plan and Scheduling Order.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.